F-AFS-K65170-AZ

EC-2

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX
75 Hawthorne Street
San Francisco, CA 94105

September 18, 1997

Steve Calish
District Ranger
Long Valley Ranger District
Attn: Pocket/Baker Ecosystem FEIS
HC 31 Box 68, Happy Jack, AZ 86024

Dear Mr. Calish:

The Environmental Protection Agency (EPA) has reviewed the Final Environmental Impact Statement (FEIS) for the project entitled **Pocket/Baker Ecosystem, Coconino National Forest, Long Valley Ranger District, Coconino County, Arizona.** Our review is pursuant to the National Environmental Policy Act (NEPA), Council on Environmental Quality (CEQ) regulations (40 CFR Parts 1500-1508), and Section 309 of the Clean Air Act.

The Forest Service has evaluated several alternatives for managing the Pocket/Baker analysis area which is located atop of the Mogollon Rim at the south-central portion of the Coconino National Forest next to the Tonto National Forest. The area encompasses approximately 23,200 acres and includes prominent geographical features such as the Baker Butte; Milk Ranch, Strawberry, and Nash Points; the Mogollon Rim; Five-Mile and 29-Mile Lakes and Fossil Creek Wilderness (Calf Pen and Sandrock Canyons). The Forest Service developed alternatives based on a landscape ecosystem analysis of the area and the need to address six significant management issues: effect of dwarf mistletoe infection on the sustainability of Mexican Spotted Owl (MSO) nesting/roosting habitat, absence of fire in the ecosystem, lack of vegetative seral stages and diversity, decline of aspen in the ecosystem, demand for recreation, and watershed damage and safety problems with the transportation system.

All alternatives, except the no action alternative (Alternative 4), include prescribed fire on approximately 17,000 acres; restoration of 50 acres of scattered aspen sites; reduction of hazards along State Highway 87; implementation of improved range management; treatment of dwarf mistletoe infected sites by timber harvest; and partnerships to restore Forest Service Road 608 and re-open Cinch Hook snowplay area for safe winter recreation. Alternatives differ by the type and extent of Mexican Spotted Owl limitations applied to management and the number of acres harvested. Alternative 1 would be limited by Interim Directive #2 and dispersal habitat guidelines for the management of the Mexican Spotted Owl and would include about 5,650 acres of harvest. Alternative 2, the preferred alternative in the Draft EIS, would not be limited by the dispersal habitat guidelines and would harvest about 6,800 acres. Alternative 3

While the FEIS included an evaluation of historical projects and existing conditions, it continues to have very little detailed evaluation of the cumulative impacts of the proposed management actions. Cumulative impact is the impact on the environment which results from the incremental impact of the action when added to other past, present, and reasonably foreseeable future actions regardless of what agency (Federal or non-Federal) or person undertakes such other actions. Cumulative impacts can result from individually minor but collectively significant actions taking place over a period of time [40 CFR Section 1508.7]. We urge the Forest Service to include in the Record of Decision (ROD) and subsequent project specific environmental documentation a more thorough cumulative impact assessment. This assessment should describe management prescriptions and plans for adjoining areas, including the areas within the neighboring Tonto National Forest. We encourage the Coconino National Forest and Tonto National Forest to collaborate on compatible and complementary projects and management strategies along their joint borders.

To address nonpoint source pollution and water quality, the Forest Service and the State of Arizona have entered into an intergovernmental agreement. As a result, the Forest Service agrees to develop and utilize Best Management Practices (BMP) for each project and plan. We urge the Forest Service to clearly state this commitment in the ROD.

We also note that the proposed new grazing system may result in higher use levels than are prescribed by the Region 3 - Range Analysis Handbook (pg. 117). To minimize potential adverse impacts, the Forest Service should closely monitor the new system and reconsider stocking levels if adverse habitat and water quality effects are probable. A commitment to such monitoring and specific environmental documentation for the implementation of the new grazing system should be placed in the Record of Decision.

We appreciate the opportunity to review this FEIS. Please send us a copy of the modified Record of Decision when it is released to the public. If you have any questions, please call Ms. Laura Fujii, of my staff, at (415) 744-1579.

Sincerely,

David J. Farrel, Chief
Federal Activities Office
Cross Media Division

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EPA REGION IX SUMMARY PARAGRAPH

ERP NUMBER: F-AFS-K65170-AZ

CEQ NUMBER: 970332

DATE OF EPA COMMENT LETTER: 09/18/97

DATE SENT TO EPA HQ: 09/18/97

NAME OF PRINCIPAL REVIEWER: FUJII

NAME OF PROJECT EIS:

Pocket/Bear Ecosystem and Land Management Plan

SUMMARY PARAGRAPH:

EPA endorsed the development of an alternative which will comply with the final MSO Recovery Plan and Regional Spotted Owl and Northern Goshawk EIS for Amendments to the Forest Plans. We strongly supported the commitment to extensive road closures and obliterations, monitoring, and adaptive management. However, we remain concerned that future long-term benefits (30-60 years from now) from proposed harvesting to treat mistletoe may not out weigh the short-term impacts. Thus, we strongly urge a firm commitment in the Record of Decision (ROD) to project specific environmental documentation, development of an implementation Action plan, and continued work with the USFWS to ensure preservation of MSO species viability. EPA expressed remaining concerns with the cumulative impact analysis, potential high grazing use levels, and perception by the public that the management goal is timber production versus forest health. We urged the Forest Service to address these concerns in their ROD and subsequent project specific environmental documentation.

APPROVED FOR FEDERAL REGISTER PUBLICATION BY:_____